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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-0411 JSW
)	
Plaintiff,)	
)	
v.)	PROPOSED ORDER AND
)	STIPULATION EXCLUDING TIME
IGNACIO PEREZ-MACIAS,)	FROM THE SPEEDY TRIAL ACT
aka Ignacio Ramos,)	CALCULATION
)	(18 U.S.C. § 3161 (h)(8)(A))
Defendant.)	
)	

The parties stipulate and agree, and the Court finds and holds, as follows:

1. The parties appeared on the instant matter June 9, 2006 for defendant's arraignment on the indictment before the Honorable Judge Maria-Elena James. On June 9, 2006, the matter was continued to June 15, 2006 for initial appearance in front of the Honorable Jeffrey S. White.
2. On June 15, 2006, the parties appeared in front of the Honorable Jeffrey S. White and the matter was continued to July 20, 2006 for status / trial setting.
3. On June 15, 2006, Assistant Federal Public Defender Ronald Tyler, who represents the

defendant, requested an exclusion of time from June 15, 2006 to July 20, 2006, based on effective preparation of counsel. The parties moved that this same time period be excluded from the calculation of time under the Speedy Trial Act.

3. In light of the foregoing facts, the failure to grant the requested exclusion would unreasonably deny counsel for the defense the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(A), (B)(iv). The ends of justice would be served by the Court excluding the proposed time period. These ends outweigh the best interest of the public and the defendant in a speedy trial. See id. § 3161(h)(8)(A).

4. For the reasons stated, the time period from June 15, 2006 through July 20, 2006 shall be excluded from the calculation of time under the Speedy Trial Act.

IT IS SO STIPULATED.

DATED: _____

Respectfully Submitted,

KEVIN V. RYAN
United States Attorney

/S/

NAHLA RAJAN
Special Assistant United States Attorney


DATED: _____

/S/

RONALD TYLER
Counsel for Ignacio Perez-Macias

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 29, 2006



HONORABLE JEFFREY S. WHITE
United States District Judge